

1 RUSSELL S. HUMPHREY, SBN 208744
2 343 E. Main Street, Suite 714
3 Stockton, Ca. 95202
4 Telephone: (209) 625-8976
5 Facsimile: (209) 625-8673
6 Email: russell@humphreylawgroup.net

7 Attorney for Plaintiff
8 FRANCISCA MORALEZ
9
10
11
12

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15
16
17

18 FRANCISCA MORALEZ,

19 Case No. 3:15-cv-04388-EDL

20 PLAINTIFF,

21
22
23
24
25
26
27
28

PLAINTIFF'S APPLICATION FOR
DEFULT JUDGMENT BY COURT

v.

LOS MOLCAJETES, et al.

DEFENDANTS.

TO DEFENDANT CRESPIN LIESELOTTE AND HER ATTORNEY OF
RECORD:

PLEASE TAKE NOTICE THAT on February 7, 2017 at 9:00 a.m., or as soon
thereafter as this matter may be heard by the above-entitled Court, located at the United States
Courthouse, 450 Golden Gate Avenue, San Francisco, Ca. 94102, plaintiff will present its
application for a default judgment against defendant Crespin Lieselotte. The clerk has previously
entered the default of said defendant on April 11, 2016.

1 At the time and place of hearing, plaintiff will present proof of the following
2 matters:

- 3 1. Defendant Crespin Lieselotte is not a minor or incompetent person or in
4 military service or otherwise exempted under the Soldiers' and Sailors' Civil
5 Relief Act of 1940; and
- 6 2. Said defendant has not appeared in this action.
- 7 3. Plaintiff is entitled to judgment against said defendant on account of the
8 claims pleaded in the complaint, to wit violations of the Americans with
9 Disabilities Act of 1990, 42 U.S.C. §12182(a), 42 U.S.C. §12182(b)(1)(A)(I);
10 violations of California Civil Code §51 et seq.; violations of California Civil
11 Code §54 et seq.
- 12 4. The amount of judgment sought is the sum of \$12,250.00, as set forth in the
13 declaration of Attorney Russell S. Humphrey.

14
15 This Application is based on this Notice, the attached declaration of Attorney
16 Russell S. Humphrey, and the pleadings, files and other matters that may be presented at the hearing.
17
18

19 DATED: November 28, 2016

Russell S. Humphrey, Attorney at Law

21 */s/ Russell S. Humphrey*

22 _____
23 Attorney for Plaintiff
24
25
26
27
28